

United States District Court
Eastern District of Washington

JEFFREY R FERGUSON

(JGF) minor

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

SPOKANE SUPERIOR COURT

(see attached list of defendants)

*(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the
space provided, please write "see attached" in the space
above and attach an additional sheet of paper with the full list
of names. The names listed in the above caption must be
identical to those contained in Section I. Do not include
addresses here.)*

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

OCT 31 2022

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

Case No. 2:22-cv-00236-SAB

(To be filled out by Clerk's
Office only)

COMPLAINT

Jury Demand?

☒ Yes

☐ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:	JEFFREY R FERGUSON		
	Name (Last, First, MI)		
	910 W Fairview Ave		
	Street Address		
	Spokane, Spokane	WA	99205
	County, City	State	Zip Code
	509-608-0565	daddy.fights.4u@gmail.com	
	Telephone Number	E-mail Address (if available)	

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:	SPOKANE SUPERIOR COURT		
	Name (Last, First)		
	1116 W Broadway Ave		
	Street Address		
	Spokane , Spokane	WA	99260
	County, City	State	Zip Code
Defendant 2:	(see attached for list of defendants)		
	Name (Last, First)		
	Street Address		
	County, City	State	Zip Code

Defendant(s) Continued

(see attached for list of defendants)

Defendant 3:

Name (Last, First)

Street Address

County, City

State

Zip Code

Defendant 4:

(see attached for list of defendants)

Name (Last, First)

Street Address

County, City

State

Zip Code

II. BASIS FOR JURISDICTION

Check the option that best describes the basis for jurisdiction in your case:

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☐ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☒ **Federal Question:** Claim arises under the Constitution, laws, or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

18 USC 241, Conspiracy Against Rights

18 USC 242, Deprivation of Rights Under the Color of Law

18 USC 371, Conspiracy to Defraud the United States

18 USC 1201, (a)(1)(2)(3)(5)(b)(c)(d)(e)(f)(g)(1)(A)(B)(i)(ii)(iii)(IV)(V)(VI)(VII)

III. VENUE

This court can hear cases arising out of the Eastern District of Washington.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

Federal Question Requires the District Court Hearings cases that arise under Federal Question

And all the above apply to most defendants

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

Spokane Superior Court, Paul DiNenna office in Spokane

Date(s) of occurrence: 05/2016 to present day

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What
happened to
you?

All defendants acted biased by conspiracy to deprive my rights due to my
filed complaints to the state bar association and commission for judicial conduct as well
as influenced by Jared B Smith due to their financial relationships, case history of Jared
B Smith, Personal knowledge of Jared B Smith and Jared B Smith's family ties to many
people in the legal world.
Paul DiNenna Jr would lead this assault on the lives of my daughter and myself with his
tactics he would have and influence to act, the judges and commissioners listed as defendants.

Each officer of the court would act outside of their entitled scope of employment and abuse the powers entrusted into them to see to the public's needs.

Each defendant acted in such a way that would deprive my child and myself the protected rights as the constitution guarantees. The freedom to have a voice and heard and access to the court to petition for redress was denied. Not only as retaliation towards myself for my complaints against them, they would also act to protect Jared Blair Smith for the sexual assault prosecution i would seek. Jared Blair Smith has a long history of sexual assaults to minors and most have been dismissed and or settled outside of court.

Jared Blair Smith has a long criminal history which most cases had been dismissed by prosecuting attorneys on cases dealing with Jared Blair Smith. Many of the judges and commissioner heard Jared Blair Smith's case in the Superior Court of Spokane.

Court records show this.

Callalily Q Ferguson since 2016 has been committing perjury, fraud, false evidence, child abuse, kidnapping in the second degree due to the sexual intent of Jared Blair Smith

Through Paul DiNenna actions through the court he would purposely make sure I lost visitation, custody of my child, my income unlawfully garnished, commit unreasonable amounts of perjury, fraud, forgery, ID theft, extortion and racketeering as defined in RECO ACT and other federal code violations. Human Trafficking for payment and , malice destruction of the lives of (JGF) minor and myself.

Was
anyone
else
involved?

All defendants had been well aware of their lack of authority and within their capaticity.

Once the word was spread through the court house by Mr. DiNenna I could see my rights diminish and abuse really start. Staff that I had not even met before would know give me a hard time in the lines or as I turn in my paper work ro the clerks office.

Judges , commission and pro tempores would violate their oath of office as well as local rules and Constitutional rights. See defendant list to see who was involved

Judge Plese worked with Jared b Smith at Bank of America for many years as she knew him well and was well aware she should have recused herself which did but only after making poor biased ruling on my case like all the rest that had been preassigned.

They would come on to the case just long enough to rule in favor of Mr. DiNenna and Ms.

Ferguson then recues. Judge Fennessy a Broker Judge licensed just like Jared B smith

to work across the United States selling Securities and Real estate would be very familiar

with each other. Judge Fennessy would allow Mr.DiNenna to forge court orders and once

Mr. DiNenna has found doing this after the correction was made Mr.DiNenna would

~~continue to use the wrongly worded order cause it would be ruled on in his favor.~~ Paul DiNenna knew just what lie to say and when to use it. Mr. DiNenna and Ms. Ferguson committed endless perjury through out this case for advancement purposes only and when I did not have

counsel they would really abuse my rights cause I did not know my rights or court process.

Over 39 times Mr. DiNenna would use ex parte without service to me. and many commissioners

and judge would allow this due to the disliking of me. Retaliation is the basis for the ill minded

rulings that would destroy my life over the last 3 years. With no findings or evidence to

show cause Spokane Superior Court would be wide spread knowledge of my case and act

against me for the complaints that I filed seeking help cause this abuse was most certainly

happening.

By request of Mr. DiNenna and Ms. Ferguson Commissioner and prosecutor Tony Rugel would sit in hearings that I was unaware of signing orders that Mr. DiNenna would present.

Judge Jacquelyn M High-Edward would perjure herself when Ms. Wofford and Kelly Sawyer in open court ask the Judge High-Edward to lie and state on the record that I had been

served notice of the hearing they had been in that day asking and recieving retraining

orders when uncalled for and not within the guide lines to recieve one. Judge Jacquelyn

High-Edward would do just what they asked and on the record would do just that. She

lied under oath of office to the request that I was notified and chose not to show. I was

in no way notified my any means. Commissioner Ressa would knowing Mr. DiNenna was only acting maliciously with his filings of motions and would make comments to him

on the record about choosing her battles wisely for her yet granting Mr. DiNennas requests.

Judge Michael Price would share the same hobby of airplane pilot as Jared Smith does

utilizing the same small airports in Spokane and having good knowledge of who Jared

Smith is acting biased dismissing our case and then as requested by Mr.DiNenna Judge

Price would allow it wiping out all the hearing dates that I had scheduled for revision

Who did
what?

V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

and only bringing back issues that Mr. DiNenna had in place. With out counsel I had not been able to exercise my rights protected the Constitution. Due process was abused by biased acts from

Spokane Superior Court so severely that not one attorney in this county or any surrounding counties would take my case after Oct 31st 2019 due to the corrupt act of the Mr. DiNenna through the Superior Court of Spokane. The court through Mr.DiNenna would ignore my complaints of Jared Smith sexually abusing my daughter for the last 3 years or more only to protect Jared Smith from Prosecution as they have in Jared Smiths past. They forced my daughter to live with Ms. Ferguson and Jared Smith not for my daughters best interest or due to anything I had done to lose my child but for retaliation against me. See Judge Moreno's facts and findings where she states on the record that thier was

no findings of child abuse but was taking my daughter from me permentaly and fining me over \$50.000 in attorney fees and back dated child support when we never had ordered support cause I filed complaints

VI. **RELIEF** against them all, she states all of the Spokane Superior Court, She acted on behalf of the Spokane Superior Court. See verbatim Jan 2021 Judge Moreno. see attached. The relief I want the court to order is:

☒ Money damages in the amount of: \$ 1000000

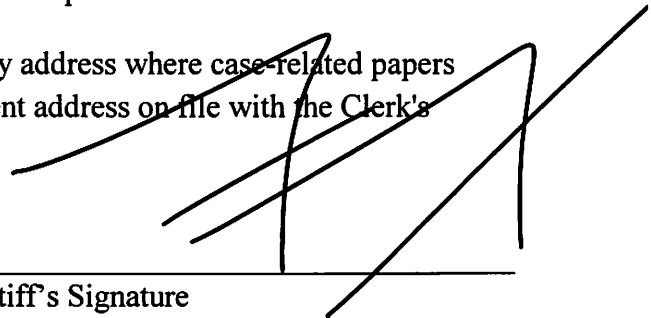
☐ Other (explain):

I ask the court to investigate case # 16-3-01124-0 for violations within the handling of the case and into Jared Blair Smith and the evidence I hold to show his involcvmemnt with the Superior court official and the acts by Mr. DiNenna in depriving my rights to protrect Mr. Smith and the kidnapping of my child acting under the color of law against me so I could not be heard and protect my child as I am trying to do. They have also refused to enroll my daughter in counseling as ordered by Moreno cause they know my daughter will tell on Mr. Smith and Ms. Ferguson for the on going abuse within their home. I ask the court to take my (JGF) and upon seeing I am telling the truth to plwease reverse the court ordered ruling of fthe Superior court and return (JGF) to my case and enforce the law as it reads for crimes by against us. I ask for the court to grant monetary damages as listed so my child and I can rebuild what was taken and help others that are going through the same things by the hands of corrupt law.

VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.



Dated

Plaintiff's Signature

FERGUSON JEFFREY R

Printed Name (Last, First, MI)

910 W FairView Ave

Spokane

WA99205

Address

City

State

Zip Code

509-605-0565

daddy.fights.4u@gmail.com

Telephone Number

E-mail Address (if available)

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.